

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
Dallas Division**

CHARLENE CARTER, Plaintiff, v. SOUTHWEST AIRLINES CO., AND TRANSPORT WORKERS UNION OF AMERICA, LOCAL 556, Defendants.	Civil Case No. 3:17-cv-02278-X
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**[Proposed] Order Granting Plaintiff's Renewed Motion to Compel Discovery
from Transport Workers Union of America, Local 556**

Before the Court is Plaintiff Charlene Carter's Renewed Motion to Compel Discovery from Defendant Transport Workers Union of America, Local 556. After considering the Motion, the Court finds that the Motion should be granted.

IT IS THEREFORE ORDERED that Plaintiff's Renewed Motion to Compel Discovery is hereby GRANTED. The Court also RULES and ORDERS as follows:

1. Defendant Local 556 is ORDERED to produce responsive information in its possession, custody, and control, wherever located, including information kept by union executive board members, employees, and working women's committee members, on their personal email accounts and electronic devices, within 30 days after the date of this Order.

2. Defendant Local 556 is ORDERED to cure the deficiencies in its August 3, 2020 privilege log by amending the log to add entries for each document withheld, to incorporate entries for all of its work product privilege claims, to identify authors and recipients by first and last name, to give an adequate explanation of each document's contents, and to add a "Bates Number" column.

Defendant Local 556 is ORDERED to serve Plaintiff with an amended privilege log within 14 days after the date of this Order.

3. The Court further orders that Defendant Local 556 shall pay to Plaintiff her reasonable attorneys' fees and expenses in an amount to be determined by this Court. Plaintiff shall file with the Court evidence of such attorneys' fees and expenses within 30 days after the date of this Order.

SIGNED on _____, 2020.
